

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

19- CR-227-LJV

v.

JOSEPH BONGIOVANNI,
PETER GERACE, JR.,

Defendants.

UNITED STATES OF AMERICA,

23-CR-37-LJV

v.

PETER GERACE JR.,

Defendant.

MOTION TO SEAL

PLEASE TAKE NOTICE that upon the annexed Declaration of Steven M. Cohen, Esq., Defendant, Peter Gerace, Jr., moves this Court for an Order sealing Defendant's Reply on the Motion for Release dated August 14, 2023 for the reasons set forth in the accompanying Declaration.

DATED: August 14, 2023
Amherst, NY

Respectfully submitted,

/s/ Steven M. Cohen, Esq.
Steven M. Cohen, Esq.
Attorneys for Peter Gerace, Jr.
2410 North Forest Road, Suite 301
Amherst, New York 14068
Telephone: (716) 636-7600
Fax: (716) 636-7606

TO: Joseph M. Tripi, Esq.
Assistant United States Attorney
138 Delaware Avenue
Buffalo, New York 14202

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DECLARATION

STEVEN M. COHEN, being duly sworn, deposes and says:

1. Declarant is counsel for Defendant, Peter Gerace, Jr.
2. It is respectfully requested that the Defendant's Reply on the Motion for Release dated August 14, 2023 be filed under seal.
3. This request is made to ensure that matters encompassed by the Protective Order are not publicly disclosed.

WHEREFORE, deponent respectfully requests that this Court grant the relief requested herein, together with such other and further relief as the Court deems proper.

DATED: August 14, 2023
Amherst, NY

Respectfully submitted,

/s/ Steven M. Cohen, Esq.
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